Mr. Bob Beyke
Milestone Contractors, L.P.
5950 South Belmont Avenue
P.O. Box 421459
Indianapolis, Indiana 46242-1459

Re: **097-11768-00086**
First Administrative Amendment to
FESOP 097-5501-00086

Dear Mr. Beyke:

Milestone Contractors, L.P. was issued a FESOP on February 2, 1998 for a stationary asphalt plant located at 4202 South Harding Street in Indianapolis, Indiana. Three (3) letters requesting changes to this permit were received on May 28, 1998, October 21, 1998 and January 27, 1999. The administrative amendment request letters were to:

(a) correct typos that pertained to conflicting equipment descriptions in Section A versus Section D but were accounted for in the initial FESOP application review in the Technical Support Document and/or Reporting Forms,

(b) change the 24,000 gallon storage tank in Condition A.3 (and Section D.2) to a 21,000 gallon storage tank constructed in 1978 and, therefore, not subject to 40 CFR 60.110b (Standards of Performance for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction or Modification Commenced after July 23, 1984),

(c) add two (2) new storage tanks subject to 40 CFR 60.110b in Condition A.3 (and Section D.2).

(d) correct typos that pertained to conflicting emission limitations in Conditions D.1.1, D.1.2, D.1.3 and Reporting Forms but were accounted for in the initial FESOP application review in the Technical Support Document and/or Reporting Forms.

(e) include reference methods for PM10 stack testing in Condition D.1.8 Testing Requirements.

(f) request an increase in VOC potential to emit in Condition D.1.4 which were limited such that 326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities) did not apply. This request does not meet the classification as an Administrative Amendment and is not included in this First Administrative Amendment.

(g) request the inclusion of the applicable requirement of 20% opacity pursuant to the New Source Performance Standard (NSPS) for asphalt plants under Subpart I. This request does not meet the classification as an Administrative Amendment and is not included in this First Administrative Amendment.

Pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended with deletions as strikeouts and additions in bold as follows:

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary hot drum-mix asphalt plant fired primarily on natural gas with ~~coal (which when fired is done so simultaneously with natural gas) and~~ **virgin** #2 fuel oil **and waste oil** as backup fuels. This plant has a maximum output of 500 tons of asphalt per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

(a) Natural gas-fired combustion sources with a heat input equal to or less than 10 MMBTU/hr.
  (1) One (1) Gentec hot oil heater, fired by natural gas and rated at 2200 MBTU/hr. The heater exhausts at stack/vent ID 5.

(b) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than 6 MMBTU/hr.

(c) Fuel oil-fired combustion sources with heat input equal to or less than 2 MMBTU/hr and firing fuel containing less than 0.5 percent sulfur by weight.

(d) Combustion source flame safety purging on startup.

(e) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(f) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(h) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(i) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.

(j) Cleaners and solvents characterized as follows: (a) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100^{o}F) or; (b) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20^{o}C (68^{o}F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(k) Closed loop heating and cooling systems.

(l) Replacement of repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

(m) Paved and unpaved roads and parking lots with public access.

(n) A laboratory as defined in 326 IAC 2-7-1(20)(C).

(o) One (1) 30,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0 kPa.

(p) One (1) ~~24,000~~ **21,000** gallon VOL storage tank, maximum true vapor pressure less than 15.0 kPa.

(q) One (1) 10,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0 kPa.

(r) One (1) 20,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0kPa.

(s) One (1) 22,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0kPa.

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan ~~submitted on 3/15/97~~ **resubmitted on May 28, 1998.**

C.8 Stack Height [326 IAC 1-7]

(a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

(b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

(c) Asphalt concrete plants are exempted from the requirements specified in 326 IAC 1-7-3.

D.1.1 Nitrogen Oxides (NOx)-Emission Limitations [326 IAC 2-8-4(1)]

Pursuant to 326 IAC 2-8-4, the input usage of natural gas in the drum mixer burner shall be limited to 356.4 MMCF per 365 day period, rolled on a daily basis. For purposes of determining compliance for Nitrogen Oxide emissions, every 1000 gallons of waste oil burned shall be equivalent to ~~0.03795~~ **0.0291** MMCF of natural gas, and every 1000 gallons of virgin No. 2 distillate fuel oil shall be equivalent to 0.0364 MMCF of natural gas. This limit is equivalent to nitrogen oxide emissions of 98.0 tons per 365 day rolling period, rolled on a daily basis. During the first 365 days of operation under this permit, the input of natural gas and natural gas equivalents shall be limited such that the total MMCF divided by the accumulated calender days shall not exceed ~~.98~~ **0.976** MMCF per day. Due to the above limit, the Prevention of Significant Deterioration (40 CFR 52.21) rules and the Part 70 Permit Program (326 IAC 2-7) rules do not apply.

D.1.2 Sulfur Dioxide (SO_2)-Emission Limitations [326 IAC 7-1.1-2, 2-8-4(1)]

Pursuant to 326 IAC 7-1.1-2, and 326 IAC 2-8-4(1) the sulfur dioxide emissions shall be limited as follows;

a) The percent sulfur in waste oil/ residual oil burned shall not exceed 0.75 percent sulfur by weight. This limit satisfies the requirements of 326 IAC 7-1.1-2.

b) When using No. 2 distillate fuel oil the SO2 emissions from the 135 MMBTU burner shall be limited to .5 pounds per million BTU heat input, or a sulfur content of less than or equal to .5 percent. This limit satisfies the requirements of 326 IAC 7-1.1-2.

c) Pursuant to 326 IAC 2-8-4(1), the input usage of waste/ residual oil in the drum mixer burner shall be limited to 1,774,300 gallons per 365 day rolling period, rolled on a daily basis. For purposes of determining compliance with the Sulfur Dioxide emissions, every

1000 gallons of No. 2 distillate fuel oil burned shall be equivalent to ~~0.5992~~ **646.5** gallons of waste oil, and every million cubic feet of natural gas shall be equivalent to ~~0.0051~~ **5.35** gallons of waste oil. This limit is equivalent to sulfur dioxide emissions of 98.12 tons per 365 day period, rolled on a daily basis. During the first 365 days of operation under this permit, the input of waste oil equivalents shall be limited such that the total gallons divided by the accumulated calender days shall not exceed 4861 gallons per day. Due to the above limit, the Part 70 Permit Program (326 IAC 2-7) rules do not apply.

D.1.3 Particulate Matter (PM)-Emission Limitations [326 IAC 6-1-2]

That pursuant to 326 IAC 6-1-2 and 326 IAC 2-8-4, particulate matter (PM ~~and PM-10~~) emissions from the asphalt plant **drum dryer mixer and burner** shall not exceed 0.030 grains per dry standard cubic foot, or 15.4 pounds per hour. This limit satisfies the requirements of New Source Performance Standards, 326 IAC 12 (40 CFR 60.90 to 60 .93, Subpart I). ~~and the requirement of the part 70 operating permit regulation 326 IAC 2-7.~~

D.1.4 Particulate Matter less than Ten (10) Microns (PM10) [326 IAC 2-8-4(1)]

That pursuant to 326 IAC 2-8-4(1), particulate matter less than ten (10) microns (PM-10) emissions from the asphalt plant drum dryer mixer and burner shall not exceed 15.4 pounds per hour including both filterable and condensible fractions. Compliance with this limit shall satisfy 326 IAC 2-8-4. Therefore, the Part 70 Permit Program rules do not apply.

Conditions D.1.4 through D.1.12 have been renumbered to **D.1.5 through D.13**, respectively, to reflect the addition of **D.1.4 Particulate Matter less than Ten (10) Microns (PM10) [326 IAC 2-8-4(1)]**

D.1.~~4~~**5** Volatile Organic Compound (VOC-Emission Limitations [326 IAC 2-8-4(1)]**[326 IAC 8-5-2]**

(a) The VOC usage in the production of cold mix asphalt (stockpile mix) shall be limited to 21.7 tons per consecutive twelve month period rolled monthly. During the first year the amount of liquid binder shall be limited to 238.6 tons per/month. This is equivalent to 2864 tons of binder used per twelve month period in the production of cold mix (stockpile mix) based on 1.0% diluent present in the asphalt. This production limit has been instituted in order to insure that the total emission from this source for VOC remain below twenty-five (25) tons per year such that 326 IAC 8-1-6 does not apply. Due to the above limits, the Prevention of Significant Deterioration (326 IAC 2-2 and 40 CFR 52.21) and the Part 70 rules do not apply.

(b) Pursuant to 326 IAC 8-5-2 (Miscellaneous Operations: Asphalt Paving), no person shall cause or allow the use of cutback asphalt or asphalt emulsion containing mor than seven percent (7%) oil distillate by volume of emulsion for any paving application except:

(1) penetrating prime coating,
(2) stockpile storage, and
(3) applications during the months of November through March.

D.1.~~3~~**9** Testing Requirements

During the period between 24 and 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM **and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM10**, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. **PM10 includes filterable and condensible PM10. In addition to these requirements, IDEM, OAM and ERMD may require compliance testing when**

necessary to determine if the facility is in compliance.

SECTION D.2 FACILITY OPERATION CONDITIONS

Insignificant Emitting Activities	
~~(1)~~**(o)**	One (1) 30,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0 kPa.
(2)**(p)**	One (1) ~~24,000~~ **21,000** gallon VOL storage tank, maximum true vapor pressure less than 15.0 kPa. **Installation date of 1978.**
(r)	**One (1) 20,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0kPa.**
(s)	**One (1) 22,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0kPa.**

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.2.1 Operational Parameters

The 30,000 gallon storage tank, the 22,000 gallon storage tank and the 20,000 gallon storage tank ~~Storage tanks~~ **each** shall comply with the New Source Performance Standards (NSPS), 326 IAC 12 (40 CFR Part 60.116b only, Subpart Kb). 40 CFR Part 60.116b requires the permittee to maintain accessible records showing the dimension of each storage vessel and an analysis showing the capacity of the storage vessel. Records shall be kept for the life of the storage tanks. In addition, the owner or operator shall notify the Administrator when the maximum true vapor pressure of any VOL stored in these vessels exceeds 27.6 kPa pr 4.00 psia.

Reporting Forms Administratively Amended

On page 34 of 39, the Emergency/Deviation Occurrence Form has the source address amended as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

and

INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA
2700 S. Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Milestone Contractors
Source Address: ~~4200~~ **4202** S. Harding St.

Part 70 Permit No.: F097-5501-00086

On Page 37 of 39 the FESOP Quarterly Report Form for sulfur content of distillate and waste oil fuels has the source address amended as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, DATA COMPLIANCE

FESOP Quarterly Report

Source Name:	Milestone Contractors
Source Address:	~~4200~~ **4202** S. Harding St.
FESOP No.:	F097-5501-00086
Facility:	Dryer/Burner
Parameter:	Percent sulfur by weight for all fuel oil
Limit:	Sulfur content of the No. 2 distillate fuel oil not to exceed 0.50%; Sulfur content of the waste oil not to exceed 0.75%

On page 38 of 39, the FESOP Monthly Report Form for the dryer/burner has the source address amended and the correction in the typos for waste oil equivalences and is amended as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA

FESOP Monthly Report

Source Name:	Milestone Contractors
Source Address:	4200 S. Harding St.
FESOP No.:	F097-5501-00086
Facility:	Dryer/ Burner
Limit:	The dryer / burner shall be limited to 1,774,300 gallons of waste oil and waste oil equivalent during the last 365 day period. For purposes of determining compliance, every MMCF of natural gas burned shall be equivalent to ~~0.0051~~ **5.35** gallons of waste oil, based on SO2 emissions. Every 1,000 gallons of No. 2 distillate fuel oil burned with a maximum sulfur content of 0.50% shall be equivalent to ~~0.5992~~ **646.5** gallons of waste oil based on SO2 emissions. During the first 365 days of operation under this permit, the input of waste oil and waste oil equivalents shall be limited such that the total gallons divided by the accumulated calender days shall not exceed 4,861 gallons per day.

On page 39 of 39, the FESOP Monthly Report Form Nox emissions has the source address amended and the correction in the typo for natural gas equivalence amended as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT, OFFICE OF AIR MANAGEMENT, COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION, AIR QUALITY MANAGEMENT SECTION
FESOP Monthly Report

Source Name:	Milestone Contractors	Source Address:	~~4200~~ **4202** S. Harding St. , Indianapolis, IN. 46206
FESOP No.:	F097-5501-00086	Facility:	135 MMBTU/Hr burner
Parameter:	oxides of nitrogen	Limit:	356.4 MMCF of natural gas

and natural gas equivalents during the last 365 day period. For purposes of determining compliance, every 1000 gallons of No. 2 distillate fuel burned shall be equivalent to 0.0364 MMCF of natural gas based on NOx emissions, and every 1000 gallons of waste oil burned shall be equivalent to 0.0291 MMCF of natural gas based on NOx emissions. During the first 365 days of operation under this permit, the input of natural gas and natural gas equivalents shall be limited such that the total MMCF divided by the accumulated calender days shall not exceed ~~0.979~~ **0.976** MMCF per day.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mr. Mark Caraher at (317) 327-2272.

Sincerely,

Mona A. Salem, Chief Operating Officer
Department of Public Works
City of Indianapolis

Attachments- Administratively Amended FESOP pages
Reviewer's Initials
cc: file (2 copies)
Mindy Hahn, IDEM
U.S. EPA, Region V

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR MANAGEMENT
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION

Milestone Contractors, L.P.
4202 S. Harding Street
Indianapolis, Indiana 46206

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-5501-00086	
Issued by: Robert F. Holm, Ph.D., Administrator ERMD	Issuance Date: February 20, 1998

First Administrative Amendment: F097-11768-00086	Pages Affected: 3, 4, 5, 18, 19, 19a, 27, 27a, 28, 29, 30, 31, 32, 34, 37, 38, 39
Issued by: Mona A. Salem Chief Operating Officer Department of Public Works City of Indianapolis	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Environmental Resources Management Division (ERMD), and presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary hot drum-mix asphalt plant fired primarily on natural gas with virgin #2 fuel oil and waste oil as backup fuels. This plant has a maximum output of 500 tons of asphalt per hour.

Responsible Official:	Ron Terrell
Source Address:	4202 S. Harding Street, Indianapolis, IN 46206
Mailing Address:	P.O. Box 421459, Indianapolis, IN 46242-1459
SIC Code:	2951
County Location:	Marion
County Status:	Nonattainment for TSP
Source Status:	Federally Enforceable State Operating Permit (FESOP) Program Minor Source under PSD and Emissions Offsets Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

The stationary source consists of the following emission units and pollution control devices:

(a) One (1) drum mix asphalt plant (Unit ID 2) with a maximum rated capacity of 500 tons per hour, equipped with one (1) 135 MM BTU/Hr burner (Unit ID 3): The primary fuel source is natural gas with virgin No. 2 distillate fuel oil and waste oil as a back up fuel. Particulate emissions are controlled by one (1) knock out box, and one (1) baghouse rated at 85,000 acfm, installed March 1993, and exhausting at stack 1.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

(a) Natural gas-fired combustion sources with a heat input equal to or less than 10 MMBTU/hr.
  (1) One (1) Gentec hot oil heater, fired by natural gas and rated at 2200 MBTU/hr. The heater exhausts at stack/vent ID 5.

(b) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than 6 MMBTU/hr.

(c) Fuel oil-fired combustion sources with heat input equal to or less than 2 MMBTU/hr and firing fuel containing less than 0.5 percent sulfur by weight.

(d) Combustion source flame safety purging on startup.

(e) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(f) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(h) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(i) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.

(j) Cleaners and solvents characterized as follows: (a) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or; (b) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(k) Closed loop heating and cooling systems.

(l) Replacement of repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

(m) Paved and unpaved roads and parking lots with public access.

(n) A laboratory as defined in 326 IAC 2-7-1(20)(C).

(o) One (1) 30,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0 kPa.

(p) One (1) 21,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0 kPa.

(q) One (1) 10,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0 kPa.

(r) One (1) 20,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0kPa.

(s) One (1) 22,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0kPa.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Environmental Resources Management Division (ERMD) and the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan resubmitted on May 28, 1998. The plan consists of:

1. Fugitive particulate matter (dust) emissions from paved roads, unpaved roads, and parking lots shall be controlled by one or more of the following measures:

   A. Paved roads and parking lots:

      a. Cleaning by vacuum sweeping on an as needed basis (monthly at a minimum).
      b. Power brooming while wet either from rain or application of water.

   B. Unpaved roads and parking lots:

      a. Treating with emulsified asphalt on an as needed basis.
      b. Treating with water on an as needed basis.

2. Fugitive particulate matter (dust) emissions from aggregate stockpiles shall be controlled by one or more of the following measures:

   A. Maintain minimum size and number of stock piles of aggregate.
   B. Treating around the stockpile area with emulsified asphalt on an as needed basis.
   C. Treating around the stockpile area with water on an as needed basis.

3. Fugitive particulate matter (dust) emission from outdoor conveying of aggregates shall be controlled by the following measures.

   A. Apply water at the feed and the intermediate points on an as needed basis.

4. Fugitive particulate matter (dust) emissions resulting from the transferring of aggregates shall be controlled by one or more of the following measures:

   A. Minimize the vehicular distance between the transfer points.
   B. Enclose the transfer points.

5. Fugitive particulate matter (dust) emissions resulting from transportation of aggregate by truck, front end loader, etc. shall be controlled by one or more of the following measures:

   A. Tarping the aggregate hauling vehicles.
   B. Maintain vehicle bodies in a condition to prevent leakage.
   C. Spray the aggregates with water.
   D. Maintain an 10 MPH speed limit in the yard.

6. Fugitive particulate matter (dust) emissions resulting from the loading and unloading of shall be controlled by one or more of the following measures:

   A. Reduce free fall distance to a minimum.
   B. Reduce the rate of discharge of the aggregate.

"An as needed basis" means the frequency or quantity of application necessary to minimize visible particulate matter emissions.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

(a) All air pollution control equipment listed in this permit shall be operated at all times that the emission unit vented to the control equipment is in operation, as described in Section D of this permit.

C.8 Stack Height [326 IAC 1-7]

(a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

(b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

(c) Asphalt concrete plants are exempted from the requirements specified in 326 IAC 1-7-3.

C.9 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-2.1]

(a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days before the intended test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation with five (5) days prior to the end of the initial forty-five (45) day

period.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

SECTION D.1 FACILITY OPERATION CONDITIONS

One (1) drum mix asphalt plant (Unit ID 2) with a maximum rated capacity of 500 tons per hour, equipped with one (1) 135 MM BTU/Hr burner (Unit ID 3): The primary fuel source is natural gas with virgin No. 2 distillate fuel oil and waste oil as a back up fuels. Particulate emissions are controlled by one (1) knock out box, and one (1) baghouse rated at 85,000 acfm, installed March 1993, and exhausting at stack 1.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Nitrogen Oxides (NOx)-Emission Limitations [326 IAC 2-8-4(1)]

Pursuant to 326 IAC 2-8-4, the input usage of natural gas in the drum mixer burner shall be limited to 356.4 MMCF per 365 day period, rolled on a daily basis. For purposes of determining compliance for Nitrogen Oxide emissions, every 1000 gallons of waste oil burned shall be equivalent to 0.0291 MMCF of natural gas, and every 1000 gallons of virgin No. 2 distillate fuel oil shall be equivalent to 0.0364 MMCF of natural gas. This limit is equivalent to nitrogen oxide emissions of 98.0 tons per 365 day rolling period, rolled on a daily basis. During the first 365 days of operation under this permit, the input of natural gas and natural gas equivalents shall be limited such that the total MMCF divided by the accumulated calender days shall not exceed 0.976 MMCF per day. Due to the above limit, the Prevention of Significant Deterioration (40 CFR 52.21) rules and the Part 70 Permit Program (326 IAC 2-7) rules do not apply.

D.1.2 Sulfur Dioxide (SO_2)-Emission Limitations [326 IAC 7-1.1-2, 2-8-4(1)]

Pursuant to 326 IAC 7-1.1-2, and 326 IAC 2-8-4(1) the sulfur dioxide emissions shall be limited as follows;

a) The percent sulfur in waste oil/ residual oil burned shall not exceed 0.75 percent sulfur by weight. This limit satisfies the requirements of 326 IAC 7-1.1-2.

b) When using No. 2 distillate fuel oil the SO2 emissions from the 135 MMBTU burner shall be limited to .5 pounds per million BTU heat input, or a sulfur content of less than or equal to .5 percent. This limit satisfies the requirements of 326 IAC 7-1.1-2.

c) Pursuant to 326 IAC 2-8-4(1), the input usage of waste/ residual oil in the drum mixer burner shall be limited to 1,774,300 gallons per 365 day rolling period, rolled on a daily basis. For purposes of determining compliance with the Sulfur Dioxide emissions, every 1000 gallons of No. 2 distillate fuel oil burned shall be equivalent to 646.5 gallons of waste oil, and every million cubic feet of natural gas shall be equivalent to 5.35 gallons of waste oil. This limit is equivalent to sulfur dioxide emissions of 98.12 tons per 365 day period, rolled on a daily basis. During the first 365 days of operation under this permit, the input of waste oil equivalents shall be limited such that the total gallons divided by the accumulated calender days shall not exceed 4861 gallons per day. Due to the above limit, the Part 70 Permit Program (326 IAC 2-7) rules do not apply.

D.1.3 Particulate Matter (PM)-Emission Limitations [326 IAC 6-1-2]

That pursuant to 326 IAC 6-1-2 and 326 IAC 2-8-4, particulate matter (PM) emissions from the asphalt plant drum dryer mixer and burner shall not exceed 0.030 grains per dry standard cubic foot, or 15.4 pounds per hour. This limit satisfies the requirements of New Source Performance Standards, 326 IAC 12 (40 CFR 60.90 to 60 .93, Subpart I).

D.1.4 Particulate Matter less than Ten (10) Microns (PM10) [326 IAC 2-8-4(1)])

That pursuant to 326 IAC 2-8-4(1), particulate matter less than ten (10) microns (PM-10) emissions from the asphalt plant drum dryer mixer and burner shall not exceed 15.4 pounds per hour including both filterable and condensible fractions. Compliance with this limit shall satisfy 326 IAC 2-8-4. Therefore, the Part 70 Permit Program rules do not apply.

D.1.5 Volatile Organic Compound (VOC-Emission Limitations [326 IAC 2-8-4(1)][326 IAC 8-5-2]

(a) The VOC usage in the production of cold mix asphalt (stockpile mix) shall be limited to 21.7 tons per consecutive twelve month period rolled monthly. During the first year the amount of liquid binder shall be limited to 238.6 tons per/month. This is equivalent to 2864 tons of binder used per twelve month period in the production of cold mix (stockpile mix) based on 1.0% diluent present in the asphalt. This production limit has been instituted in order to insure that the total emission from this source for VOC remain below twenty-five (25) tons per year such that 326 IAC 8-1-6 does not apply. Due to the above limits, the Prevention of Significant Deterioration (326 IAC 2-2 and 40 CFR 52.21) and the Part 70 rules do not apply.

(b) Pursuant to 326 IAC 8-5-2 (Miscellaneous Operations: Asphalt Paving), no person shall cause or allow the use of cutback asphalt or asphalt emulsion containing mor than seven percent (7%) oil distillate by volume of emulsion for any paving application except:

(a) penetrating prime coating,
(b) stockpile storage, and
(c) applications during the months of November through March.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

D.1.7 Used Oil Requirements

The waste oil burned in the dryer/burner shall comply with the used oil requirements specified in 329 IAC 13 (Used Oil Management). Pursuant to 329 IAC 13-3-2 (Used Oil Specifications), used oil burned for energy recovery that is classified as off-specification used oil fuel shall comply with the provisions of 329 IAC 13-8 (Used Oil Burners Who Burn Off-specification Used Oil For Energy Recovery), including:

(a) Receipt of an EPA identification number as outlined in 329 IAC 13-8-3 (Notification),

(b) Compliance with the used oil storage requirements specified in 329 IAC 13-8-5 (Used Oil Storage), and

(c) Maintaining records pursuant to 329 IAC 13-8-6 (Tracking).

The burning of mixtures of used oil and hazardous waste that is regulated under 329 IAC 3.1 is prohibited at this source.

Compliance Determination Requirements

D.1.8 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

(a) Pursuant to 326 IAC 3-3-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight for distillate, and 0.75% for waste oil by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a certification;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-2.1.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

D.1.9 Testing Requirements

During the period between 24 and 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM10, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM10 includes filterable and condensible PM10. In addition to these requirements, IDEM, OAM and ERMD may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements

D.1.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the dryer/burner, at least once daily when the asphalt plant is in operation . Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by ERMD and IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.11 Visible Emissions Notations

(a) Daily visible emission notations of the dryer/burner stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.12 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken daily and shall be complete and sufficient to establish compliance with the natural gas usage limits and/or the emission limits established in Condition D.1.1.

(1) the quantity of natural gas and its equivalent combusted

(b) To document compliance with Conditions D.1.2, the Permittee shall maintain records in accordance with (1) thru (5) below. Records maintained for (1) thru (5) shall be complete and sufficient to establish compliance with the fuel oil usage limits and/ the limits of the sulfur content of the fuel oil.

(1) Calendar dates covered in the compliance determination period; and

(2) Daily distillate and waste oil useage;and

(3) A 365 day rolling sum of waste oil and its distillate oil equivalents

(4) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

(5) sulfur content of the oils combusted with associated Fuel supplier certifications.

If the fuel supplier certification is to be used to demonstrate compliance the following as a minimum, shall be maintained:

(i) The name of the fuel supplier; and

(ii) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and, copies of all reports required by this permit.

(c) To document compliance with Condition D.1.5, the Permittee shall maintain monthly records of the following values;

(1) the amount of liquid binder used in the production of cold (stock pile) mix; and

(2) the average diluent content of the liquid binder; and

(3) the amount of cold mix (stockpile mix) produced.

(d) To document compliance with Condition D.1.10, the Permittee shall maintain the following:

(1) Daily records of the inlet and outlet differential static pressure; and

(2) Documentation of all response steps implemented, per event .

(3) All instruments and equipment shall be calibrated, maintained, and operated according to manufacturers specifications.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(e) To document compliance with Condition D.1.11, the Permittee shall maintain records of daily visible emission notations of the dryer/burner stack exhaust.

(f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A semi-annual summary of the information to document compliance with Condition D.1.1, D.1.2, and D.1.5 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

	Insignificant Emitting Activities
(o)	One (1) 30,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0 kPa.
(p)	One (1) 21,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0 kPa. Installation date of 1978.
(r)	One (1) 20,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0kPa.
(s)	One (1) 22,000 gallon VOL storage tank, maximum true vapor pressure less than 15.0kPa.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.2.1 Operational Parameters

The 30,000 gallon storage tank, the 22,000 gallon storage tank and the 20,000 gallon storage tank each shall comply with the New Source Performance Standards (NSPS), 326 IAC 12 (40 CFR Part 60.116b only, Subpart Kb). 40 CFR Part 60.116b requires the permittee to maintain accessible records showing the dimension of each storage vessel and an analysis showing the capacity of the storage vessel. Records shall be kept for the life of the storage tanks. In addition, the owner or operator shall notify the Administrator when the maximum true vapor pressure of any VOL stored in these vessels exceeds 27.6 kPa pr 4.00 psia.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA
2700 S. Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Milestone Contractors
Source Address:4202 S. Harding St.
Part 70 Permit No.: F097-5501-00086

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) CThe Permittee must notify the ERMD and OAM, within four (**4**) business hours; and CThe Permittee must submit notice in writing or by facsimile to ERMD and OAM within two (**2**) days, and follow the other requirements of 326 IAC 2-8-12
9 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) CThe Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, DATA COMPLIANCE

FESOP Quarterly Report

Source Name: Milestone Contractors
Source Address: 4202 S. Harding St.
FESOP No.: F097-5501-00086
Facility: Dryer/Burner
Parameter: Percent sulfur by weight for all fuel oil
Limit: Sulfur content of the No. 2 distillate fuel oil not to exceed 0.50%; Sulfur content of the waste oil not to exceed 0.75%

Quarter: _____ Year:_____

Dates fuel oil combusted	Type of fuel oil combusted (distillate #2, or waste oil)	Percent sulfur by weight of fuel oil combusted

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA

FESOP Monthly Report

Source Name: Milestone Contractors
Source Address: 4202 S. Harding St.
FESOP No.: F097-5501-00086
Facility: Dryer/ Burner
Limit: The dryer / burner shall be limited to 1,774,300 gallons of waste oil and waste oil equivalent during the last 365 day period. For purposes of determining compliance, every MMCF of natural gas burned shall be equivalent to 5.35 gallons of waste oil, based on SO2 emissions. Every 1,000 gallons of No. 2 distillate fuel oil burned with a maximum sulfur content of 0.50% shall be equivalent to 646.5 gallons of waste oil based on SO2 emissions. During the first 365 days of operation under this permit, the input of waste oil and waste oil equivalents shall be limited such that the total gallons divided by the accumulated calender days shall not exceed 4,861 gallons per day.

Month: _____ Year: _____

Day	Waste Oil usage (gal/day)	Distillate oil Usage (gal/day)	waste oil and its equivalent (gal/day)	waste oil and its equivalents (gal/365 day)	Day	Waste Oil usage (gal/day)	Distillate oil Usage (gal/day)	waste oil and its equivalent (gal/day)	waste oil and its equivalents (gal/365 day)
1					17				
2					18				
3					19				
4					20				
5					21				
6					22				
7					23				
8					24				
9					25				
10					26				
11					27				
12					28				
13					29				
14					30				
15					31				
16					no. of deviations				

9 No deviation occurred in this month.
9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT, OFFICE OF AIR MANAGEMENT, COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION, AIR QUALITY MANAGEMENT SECTION
FESOP Monthly Report

Source Name: Milestone Contractors Source Address: 4202 S. Harding St. , Indianapolis, IN. 46206
FESOP No.: F097-5501-00086 Facility: 135 MMBTU/Hr burner
Parameter: oxides of nitrogen Limit: 356.4 MMCF of natural gas and natural gas equivalents during the last 365 day period. For purposes of determining compliance, every 1000 gallons of No. 2 distillate fuel burned shall be equivalent to 0.0364 MMCF of natural gas based on NOx emissions, and every 1000 gallons of waste oil burned shall be equivalent to 0.0291 MMCF of natural gas based on NOx emissions. During the first 365 days of operation under this permit, the input of natural gas and natural gas equivalents shall be limited such that the total MMCF divided by the accumulated calender days shall not exceed 0.976 MMCF per day.

Month: _____ **Year:** _____

Day	Natural Gas usage (MMCF/day)	Waste Oil usage (gal/day)	Distillate oil Usage (gal/day)	Natural Gas usage and its equiv. (MMCF/day)	Natural Gas usage and its equiv. (MMCF/365 day)	Day	Natural Gas usage (MMCF/day)	Waste Oil usage (gal/day)	Distillate oil Usage (gal/day)	Natural Gas usage and its equiv. (MMCF/day)	Natural Gas usage and its equiv. (MMCF/365 day)
1						17					
2						18					
3						19					
4						20					
5						21					
6						22					
7						23					
8						24					
9						25					
10						26					
11						27					
12						28					
13						29					
14						30					
15						31					
16						no. of deviations					

9 No deviation occurred in this month.
9 Deviation/s occurred in this month. Deviation has been reported on: _____
Submitted by: _____ Title/Position: _____
Signature: _____ Date: _____
Phone: _____